

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Vasek Pospisil, Nicholas Kyrgios, Anastasia Rodionova, Nicole Melichar-Martinez, Saisai Zheng, Sorana Cîrstea, John-Patrick Smith, Noah Rubin, Aldila Sutjiadi, Varvara Gracheva, Tennys Sandgren, and Reilly Opelka, on behalf of themselves and all others similarly situated,

-and-

The Professional Tennis Players Association,

Plaintiffs,

v.

ATP Tour, Inc., WTA Tour, Inc., International Tennis Federation Ltd., and International Tennis Integrity Agency Ltd.,

Defendants.

Civil Action No. 1:25-cv-02207-MMG

DECLARATION OF NICKY JOHN FISHPOOL

I, Nicky John Fishpool, declare as follows:

1. I am a Senior Coordinator for the World Tennis Tour, employed by ITF Licensing (UK) Limited, which is a subsidiary undertaking of the ITF Trust, of which another subsidiary undertaking is ITF Limited ("ITF"). I have held that position since January 2024, and I have worked at ITF since October 2000. My role includes the management of an email inbox related to IPIN Membership, weekly processing of rankings and other general activities related to the World Tennis Tour. I have personal knowledge of the matters stated below, including based on my review of the

records of ITF kept in the ordinary course of its business, and if called to testify would testify consistent with this declaration.

2. Since at least 2010, ITF has required that a player has an active IPIN annual membership to enter into a WTT tournament and compete for prize money.

3. As detailed below, attached hereto are copies or excerpts of the World Tennis Tour (formerly known as the Pro Circuit) Regulations:

- i. Attached hereto as **Exhibit 1** is a copy of the 2010 Men's and Women's Pro Circuit Regulations.
- ii. Attached hereto as **Exhibit 2** is an excerpt of Sections A and B of the 2011 Men's Pro Circuit Regulations.
- iii. Attached hereto as **Exhibit 3** is an excerpt of Sections A and B of the 2012 Men's Pro Circuit Regulations.
- iv. Attached hereto as **Exhibit 4** is an excerpt of Sections A and B of the 2013 Men's Pro Circuit Regulations.
- v. Attached hereto as **Exhibit 5** is an excerpt of Sections A and B of the 2014 Men's Pro Circuit Regulations.
- vi. Attached hereto as **Exhibit 6** is a copy of the 2015 Men's and Women's Pro Circuit Regulations.
- vii. Attached hereto as **Exhibit 7** is a copy of the 2016 Men's and Women's Pro Circuit Regulations.
- viii. Attached hereto as **Exhibit 8** is a copy of the 2017 Men's and Women's Pro Circuit Regulations.

- ix. Attached hereto as **Exhibit 9** is a copy of the 2018 Men's and Women's Pro Circuit Regulations.
- x. Attached hereto as **Exhibit 10** is a copy of the 2019 Men's and Women's World Tennis Tour Regulations.
- xi. Attached hereto as **Exhibit 11** is an excerpt of Sections I and II of the 2020 Men's and Women's World Tennis Tour Regulations.
- xii. Attached hereto as **Exhibit 12** is an excerpt of Sections I and II of the 2021 Men's and Women's World Tennis Tour Regulations.
- xiii. Attached hereto as **Exhibit 13** is an excerpt of Sections I and II of the 2022 Men's and Women's World Tennis Tour Regulations.
- xiv. Attached hereto as **Exhibit 14** is an excerpt of Sections I and II of the 2023 Men's and Women's World Tennis Tour Regulations.
- xv. Attached hereto as **Exhibit 15** is an excerpt of Sections I and II of the 2024 Men's and Women's World Tennis Tour Regulations.
- xvi. Attached hereto as **Exhibit 16** is a copy of the 2025 Men's and Women's World Tennis Tour Regulations.

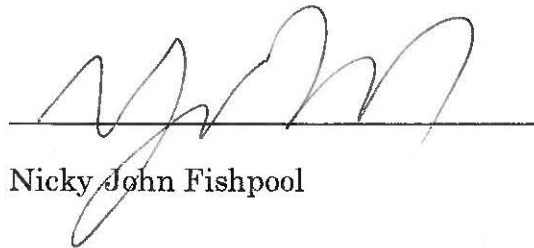
4. As detailed below, attached hereto are copies or excerpts of the ITF Constitution:

- i. Attached hereto as **Exhibit 17** is a copy of the 2010 ITF Constitution.
- ii. Attached hereto as **Exhibit 18** is a copy of the 2024 ITF Constitution.

iii. Attached hereto as **Exhibit 19** is a copy of the 2025 ITF Constitution.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 20, 2025, in England.



Nicky John Fishpool